



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

October 4, 2016

Peggy Price, Director
Imperial County Department of Social Services
2995 S. Fourth St., #105
El Centro, CA 92243

Dear Ms. Price:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of May/June 2016. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Daniel Cervantes at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Chief

JIM TASHIMA, Chief
Civil Rights Unit
Welfare to Work Division

Enclosure

c: Javier Duran, Civil Rights Coordinator

Charlie Cruz, Civil Rights Coordinator

Kim McCoy Wade, Chief
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Carlos Ocampo, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Imperial County Department of Social Services**

**Conducted on
May 30 – June 3, 2016**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
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Reviewer: Daniel Cervantes

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Imperial County Department of Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on May 31, 2016 to June 3, 2016. An exit interview was held on June 2, 2016, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Brawley One Stop	860 Main Street Brawley, CA 92227	CalWORKs Children's Services	Spanish
Calexico Family Resource Center (Mains Elementary School)	604 Birch Street Calexico, CA 92231	CalWORKs, CalFRESH, Adult Services, Children's Services	Spanish
Imperial County Department of Social Services	2895 S 4th St. 2995 S 4th St. 2999 S 4th St.	CalWORKs, CalFRESH, Adult Services, Children's Services	Spanish
Imperial County McNeese Home	315 W. McCabe	Children's Services	N/A
Calexico One Stop	301 Heber Ave Calexico, CA 92231	CalWORKs Children's Services	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2015/16 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing

- of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	9	9
Children Social Workers	5	5
Adult Program Workers	4	4
Receptionist/Screeners	8	8
Total	26	26

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	6
Non-English or limited-English speakers' case files reviewed	45
Languages of clients' cases	English, Spanish,

	Tagalog, Korean, Cantonese, Portuguese, Vietnamese, Gujarati
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Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's civil rights' compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	YES			
Can applicants access services when unable to go to the office?	YES			The county has begun the use of the mobile unit. Please see the

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
				additional comments section below.
Does the county ensure the awareness of available services for individuals in remote areas?	Yes			See additional information below.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	YES			The staff interviewed were all aware of the importance of the PUB 13. Each lobby visited had the PUB 13 readily available for the public.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes			Staff explained that the PUB 13 is given and explained to the client at intake and annual recertification.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	YES			The most current version of the PUB 13 was readily available in each lobby visited in the required threshold languages.
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	YES			The non-threshold languages were readily available behind the reception window. Reviewer explained the importance of knowing where to find the most recent version on the CDSS website.

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
Was the Pub 13 available in large print (English and Spanish), CD, audiocassette and Braille?	YES		Sometimes	All available versions of the PUB 13 were readily available behind the reception counter.
Were the current versions of the required posters present in the lobbies?		NO		Required posters were available at 604 W Birch St, Calexico, CA 92231
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	YES			All instructional and directional signage was available in Spanish, the county's only threshold language.

B. Corrective Actions

Informational Element	Corrective Action Required
Posters	Imperial County Department of Social Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

*A newer version of Form AD 475B dated 12/2015 is currently available and will be replacing the old version from 12/99 in the coming weeks. All outdated versions of this poster shall be replaced upon receipt of the newer version from CDSS.

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website.

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>

D. Additional Information: Mobile Office Project

Although an outreach program was developed many years ago, Imperial County Department of Social Services (ICDSS) recognized the need for improving these efforts. With such a geographically large county that covers 4,482 square miles, it can prove challenging for some families from the more remote locations to get to the county's 5 outstations and 1 satellite location.

New to the county since the previous review is the Mobile Office Project. The mobile unit was not created to replace the existing outstations, but rather to increase and enhance the services the department provides to families and individuals residing in the rural communities throughout the county.

The ICDSS Mobile Office will be staffed by experienced program technicians who are able to complete eligibility determinations, process benefits applications and changes to active cases, receive documents for Social Services programs remotely and enable ICDSS staff to supplement current outreach efforts. Additionally, the mobile office can be utilized as a disaster response vehicle to efficiently respond to impacted areas throughout the county in the event of an emergency.

The 36 foot recreational vehicle Mobile Unit boasts a wheelchair lift, an American Disabilities Act accessible restroom, a baby changing station, a separate reception area, and two individual workstations for confidential interviews. More information about the ICDSS Mobile Unit can be found at the ICDSS website.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

** Denotes repeat finding from previous review

1. Facility Location: 860 Main Street, Brawley, CA

Facility Element	Findings	Corrective Action
Parking	<p>**No Unauthorized Parking Sign at either parking lot entrance.</p> <p>**The words NO PARKING not painted in access aisle.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176</p>
Exterior entrance	**No ADA signage at building's entrance indicating building is ADA accessible.	In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and

Facility Element	Findings	Corrective Action
	<p>First set of double doors at building's entrance too heavy at 12 pounds.</p> <p>Second set of double doors at building's entrance too heavy at 13 pounds.</p>	<p>Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28</p> <p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
Restroom	<p>Men's:</p> <p>**Soap dispenser too high at 52 inches.</p> <p>Women's:</p> <p>**Soap dispenser too high at 52 inches.</p>	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg. 319</p> <p>All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg. 319</p>

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	YES			The lobbies visited all had posters on the wall that allowed a non-English speaking client to select their language. Since the majority of the population is Spanish speaking, none of the first contact staff interviewed have had to use the poster.
Does the county use a primary language form?		NO		The county does not have a primary language form. The county does use form IC-SAWS-1, better known as

Question	Yes	No	Some-times	Comments
				the face sheet, a double sided form that displays English on one side and Spanish on the other.
Does the client self-declare on this form?		NO		The form is filled out by the worker and is used more for organizational purposes.
Are non-English- or limited- English-speaking clients provided bilingual services?	YES			The primary language spoken throughout the county is Spanish. All employees interviewed were fluent in Spanish. Also, of the workers interviewed, none stated that they had experienced a case involving a language other than English or Spanish.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	YES			<p>The county has a sufficient amount of Spanish speaking workers to serve the Spanish speaking community.</p> <p>Although the county does have a process in place, it is almost never used. Most of the staff interviewed were aware of the language line the county is contracted with, but not one had used it, some going back as far as 10 years.</p>
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	YES			See comments above. Imperial County uses AT&T for language line services.
Is there a delay in providing services?		NO		None found during the review.
Are county interpreters determined to be competent?	YES			Interpreters must be certified through the county. It should be noted that a

Question	Yes	No	Some-times	Comments
				number of Spanish speaking workers carry a Spanish only caseload that are not certified. In speaking with these workers, it was determined that they are fluent in speaking Spanish, but not certified.
Does the county have adequate interpreter services?	YES			All of the county staff interviewed spoke Spanish.
Does the county allow minors to be interpreters? If so, under what circumstances?		NO		Minors are not allowed to interpret.
Does the county allow the client to provide his or her own interpreter?	YES			With such a high number of Spanish speaking county workers, it is very rare that a client needs a Spanish speaking interpreter. Interpretive services are normally provided by county staff.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	YES			See comments above.
Does the county use the CDSS-translated forms in the clients' primary languages?			Sometimes	For languages other than English and Spanish, the forms were provided in the client's primary language. For languages other than English and Spanish, the forms were almost always provided in English.
Is the information that is to be inserted into NOA translated into the client's primary language?		NO		In languages other than English and Spanish, the information inserted into the NOAs were not translated.

Question	Yes	No	Some-times	Comments
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?		NO		With Spanish and English being such a high percentage of the county's cases, it is rare to encounter any other language. For that reason, a procedure has yet to be developed to accommodate other languages.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?		NO		The offices visited were not equipped with all available auxiliary aids and services.
Does the county identify a client with a disability (physical, mental, or learning)?			Sometimes	The county does have a process to identify clients with disabilities.
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?			Sometimes	The county does have a process for providing reasonable accommodations with physical disabilities.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?		NO		Reviewer did not find evidence of screening for learning disabilities. Clients who cannot read and/or write are accommodated as needed.
Does the county offer screening for learning disabilities?		NO		

Question	Yes	No	Some-times	Comments
Is there an established process for offering screening?		NO		
Is the client identified as having a learning disability referred for evaluation?		NO		

B. Corrective Actions

Area of Findings	Corrective Actions
Effective Services	Imperial County Department of Social Services must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115
Timely Services	Imperial County Department of Social Services must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115
Interpreter Services	Imperial County Department of Social Services must offer and provide free interpreter services using qualified interpreters. Div. 21-104q(1) and 21-115
Written Materials	Imperial County Department of Social Services must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2
Notices of Action	When Imperial County Department of Social Services uses translated forms and materials, such as notices of actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2
Auxiliary Aids	Imperial County Department of Social Services shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired

Area of Findings	Corrective Actions
	speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41
Learning Disabilities Screening	Imperial County Department of Social Services must have a protocol in place for screening and evaluating participants in the CalWORKs WTW program with learning disability by trained staff. ACL No. 01-70 (02-64)

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	CalWORKs (Child Care)	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CWS/CMS	Face sheet	SAWS 1, face sheet	SAWS 1, face sheet
Primary language documentation	CWS/CMS	Face sheet	SAWS 1, face sheet	SAWS 1, face sheet
Method of providing bilingual services and documentation	Certified Bilingual Worker	Face sheet	C-IV notes	C-IV notes
Client provided own interpreter	CWS/CMS journal	None found	C-IV notes	C-IV notes

Documented Item	CalWorks (Child Care)	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Method to inform client of potential problem using own interpreter	CWS/CMS journal	None found	None found	None found
Release of information to Interpreter	None found	None found	None found	None found
Individual's acceptance or refusal of written material offered in primary language	None found	None found	None found	None found
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used	Minors not used
Documentation of circumstances for using minor interpreter temporarily	Minors not used	Minors not used	Minors not used	Minors not used
Method of identifying client's disability	CWS/CMS journal	Face sheet, case notes	C-IV notes	C-IV notes
Method of providing reasonable accommodation to the client with disability	None found	None found	None found	None found

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Imperial County Department of Social Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Recommendation

During the exit meeting, I recommended to the program managers that they develop some sort of template that will ensure workers fill in the required civil rights (and other required) information. With the help of CDSS, Civil Rights Unit, a template can be developed to ensure effective and accurate documentation of all case files.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?		No		The employees interviewed had responses that ranged from receiving training 6 months ago to not having received training in the past 10 years.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?			Sometimes	About half of the employees interviewed knew the process of filing a complaint. The other half stated that they are not familiar with the process because they have never had a complaint filed against them.
Does the county provide employees Cultural Awareness Training?		No		It is clear that many of the staff have been trained in the past, but in Cultural Awareness.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?			Sometimes	It is clear that many of the staff have been trained and have an understanding of the MEPA, but are trainings are not regularly provided.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes			
Does the county provide training on how to interact with clients with disabilities (physical, mental & learning)?		No		See answers above. Trainings have been provided, but are not regularly provided.

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	Imperial County Department of Social Services shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	Imperial County Department of Social Services shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2
MEPA Training for Children's Social Workers	Imperial County Department of Social Services shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator's responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes			
Did the employees know who the Civil Rights Coordinator is?	Yes			Everyone was aware of who Javier Duran and Charles Cruz were and their functions related to Civil Rights.
Did the employees know the location of the Civil Rights poster with information as to how and where the clients can file a discrimination complaint?			Sometim es	There were staff who knew how to process a complaint and where the complaint should be directed, but did not know about the Civil Rights poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	Yes			The county does not get very many discrimination complaints.

B. Corrective Action

Element	Corrective Action
Discrimination Process	Imperial County Department of Social Services shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	10

B. Corrective Action

None

X. CALL CENTER EVALUATION

Imperial County Department of Social Services does not have a call center.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. Civil Rights Unit did not receive a response from advocate groups after being notified of the compliance review.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Imperial County Department of Social Services Civil Rights Compliance Plan for the period January 1, 2016 – December 31, 2016, was received on April 1, 2016. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found the Imperial County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Mr. Javier Duran, Mr. Charlie Cruz, and Ms. Peggy Price, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Imperial County Department of Social Services in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by

management with respect to ensuring access, assistance, and compliance.

The Imperial County Department of Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.